

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 06-CA-11656

YVETTE DOWNEY, Individually  
and as Mother and Next of Kin to  
ASHLEY CELESTER, a Minor, and  
ANTHONY DOWNEY,  
Plaintiffs

v.

BDF HOLDINGS, INC.,  
Defendant

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**PROPOSED VOIR DIRE QUESTIONS OF THE**  
**DEFENDANT BDF HOLDINGS, INC.**

The defendant, BDF Holdings, Inc., requests that the Court propound the following voir dire questions:

1. Have you or any family member ever had any contact or problems with bedbugs?
2. Do you know of any friends or relatives who have had a bed bug infestation?
3. Have you read or heard anything about bedbugs through books, the internet, newspapers, magazines, television or radio?
4. Have you purchased any furniture from the defendant, and has said purchase affected your ability to fairly determine the facts in this case.

BDF HOLDINGS, INC.,  
By its attorney,  
/s/ D. MICHAEL ARTER

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D. Michael Arter (BBO#022410)  
Law Offices of Thomas M. Niarchos  
100 Summer Street, Suite 201  
Boston, MA 02110  
(617) 772-2800

DATED: August 8, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by electronic mail on August 8, 2011

By, /s/ D. Michael Arter

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D. Michael Arter